**From:** Michael Swain <michael.swain@sydney.edu.au>   
**Sent:** Wednesday, 7 August 2019 3:40 PM  
**To:** RG - Black Economy <Blackeconomy@treasury.gov.au>  
**Subject:** Submission: Exposure Draft—Currency (Restrictions on the Use of Cash) Bill 2019

Manager  
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7th August 2019

Submission: Exposure Draft—Currency (Restrictions on the Use of Cash) Bill 2019

I wish to make a submission **strongly against the draft bill** released late on the 26th July with only two weeks for comment.

Firstly, this proposed bill has had minimal public airing and there has been no genuine basis for its need disclosed. Also with such a limited time frame for comment and being released late on a Friday afternoon one wonders whether any genuine feedback was wanted!

Secondly, the amount of money in the so-called “black economy” is trivial compared with the likes of the money that is allowed to be “laundered” in the Australian economy by gamblers as outlined in the Crown Casino recent series of exposes, the major tax avoidance by global and local companies operating within Australia with the assistance of the big 4 global accounting firms. That is, I am not condoning the black economy but the government has had a series of laws in place for at least a decade to deal with this issue but has failed to have any of the regulators use the legislation against serious abusers and scammers.

Thirdly, in the document requesting feedback the second half is not present so a detailed response on all the aspects proposed is impossible.

Fourthly, the fact that the amount that is legally able to be used for transactions, $10,000 is not written in the proposed law but in the regulation section suggests that it can be readily reduced to a less amount at the discretion of the minister.

Fifthly, this proposed law seriously disadvantages anybody with savings as not only does this mean that should interest rates go negative as proposed in a recent IMF report, as a consequence of the Reserve Bank and similar entities globally having no ammunition left in the defence system with which to deal with an ever likely impending recession (trade wars, currency wars, globally debt and housing bubble in Australia, etc), but also the “bail-in” legislation that the Government has not clarified for the average saver, all indicate that savers are cannon fodder to prop-up the banks.

Finally, it is depressing that our politicians will not have a genuine discussion with the Australian public on what is really taking place and the genuine risks in the current economic climate. Instead we see that they are encouraging further debt to prop-up the housing market, which is already the most indebted/per capita in the world and as such the most vulnerable to a global recession. Also the Australian public did not give the government a mandate at the last election to enact this legislation. That is to force people to have to keep their money in banks or face serious penalties (2 years in goal).

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8th August 2019